

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

YU LING SHEN, individually and on behalf of
all other employees similarly situated,

Plaintiff,

-against-

NOTICE OF MOTION

15 CV 663(GHW)

466 AMAZE CORP. d/b/a Amaze Fusion
& Lounge, XUE MEI CHEN and JOHN (FIRST
NAME UNKNOWN) HUANG,

Defendants.

PLEASE TAKE NOTICE that, upon the Declaration of Bernard D'Orazio dated March 17, 2016, and all the exhibits annexed thereto, plaintiff will move this Court on May 5, 2016 at 2:00 p.m., at the Courthouse thereof, 500 Pearl Street-Courtroom 12C, New York, New York, for an order (A) pursuant to Federal Rules of Civil Procedure 45(e) and 37 and Local Rule 83.6 (copy attached to this Notice of Motion), holding defendants-judgment debtors 466 Amaze Corp. d/b/a Amaze Fusion & Lounge and Xue Mei Chen in contempt of court, imposing sanctions upon each, and awarding plaintiff damages including attorneys' fees, (B) pursuant to Federal Rules of Civil Procedure 37(a)(3)(B), compelling defendants-judgment debtors 466 Amaze Corp. d/b/a Amaze Fusion & Lounge and Xue Mei Chen to provide all demanded post-judgment discovery, (C) pursuant to Rule 37(d), sanctioning defendants-judgment debtors 466 Amaze Corp. d/b/a Amaze Fusion & Lounge

and Xue Mei Chen and ordering them to pay plaintiff's attorneys' fees, and (D) granting plaintiff such other and further relief as is just and proper.

TAKE FURTHER NOTICE that defendants' opposition to this motion is due no later than fourteen days following the service of this motion and plaintiff's reply, if any, is due no later than seven days following the date of service of defendants' opposition. **The Court will hold a hearing on plaintiff's motion for contempt and sanctions on May 5, 2016, at 2:00 in Courtroom 12C of the Courthouse located at 500 Pearl Street, New York, New York 10007. The parties are ordered to appear at that date and time.**

Dated: New York, New York
March 17, 2016

LAW OFFICES OF
BERNARD D'ORAZIO & ASSOCIATES, P.C.



s/Bernard D'Orazio

By: _____

Bernard D'Orazio
Attorneys for Plaintiff
100 Lafayette Street-Suite 601
New York, New York 10013-4400
(212) 608-5300
bdorazio@dorazio-law.com

TO:

466 Amaze Corp. d/b/a
Amaze Fusion Lounge
466 Amsterdam Avenue
New York, NY 10025

Xue Mei Chen
c/o Amaze Fusion & Lounge
466 Amsterdam Avenue
New York, NY 10025